July 20, 2009

Mr. Allen Norfleet Campaign Finance Analyst Reports Analysis Division Federal Election Commission 999 E Street NW Washington DC 20463

Identification Number: C00449280

Dear Mr. Norfleet:

This letter responds to your letter dated July 2, 2009, regarding the May Monthly Report (4/1/09-4/30/09), which Free and Strong America PAC, Inc. filed on May 19, 2009.

Our answers to your inquiries are as follows:

- 1. Regarding your inquiry pertaining to Schedule H1, Free and Strong America PAC, Inc. has already amended its May Monthly Report to include Schedule H1. This amendment was filed on June 16th, 2009, as soon as we realized that it had been omitted, and prior to the receipt of your letter. Free and Strong America PAC, Inc. has consistently maintained the 50% flat minimum percentage allocation ratio since it began allocating administrative costs.
- 2. As you correctly note, Free and Strong America PAC, Inc. made an expenditure for "Communications Consulting." This was an expenditure to a consulting firm that provided general communications advice and services to the PAC, which was neither for public communications (as defined under 11 CFR s.100.26) nor voter drive activity (under 11 CFR s.106.6(b)(2)(i)).

Thank you for your assistance on these matters. Please do not hesitate to contact us if you have any questions.

Sincerely,

Darrell Crate Treasurer